

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JAMES MICHAEL LITTLE	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
JAMES MICHAEL LITTLE	:	
Respondent	:	CASE NO. 1-23-bk-02273

TRUSTEE’S OBJECTION TO THIRD AMENDED CHAPTER 13 PLAN

AND NOW, this 31<sup>st</sup> day of July, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor’s plan for the following reason(s):

1. Debtor’s plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the debtor has not submitted all or such portion of the disposable income to the Trustee as required. More specifically, the debtor’s vehicle is being paid through the plan; accordingly, Schedule J should not list a vehicle payment.

2. Income from new job making \$27.00 an hour and 40 hours per week is not reflected on Schedule I.

3. Trustee avers that debtor’s plan cannot be administered due to the lack of the following:

a. Paystubs for months of June and July of 2024.

WHEREFORE, Trustee alleges and avers that debtor’s plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

a. Deny confirmation of debtor(s) plan.

- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 31st day of July, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Michael Cibik, Esquire  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102

/s/Deborah A. DePalma  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee